



Management Co., LLC's deadline to respond to Defendants Rainbow Apparel of America, Inc. and A.I.J.J. Enterprises, Inc.'s Cross-Claim is extended to **June 30, 2025**. Defendants Rainbow Apparel of America, Inc. and A.I.J.J. Enterprises, Inc.'s deadline to respond to Defendants Commonwealth Local Development Corp. and HUSA Management Co., LLC's Cross-Claim is extended to **June 30, 2025**. Future submissions must comply with the Court's Individual Rules and Practices in Civil Cases. *See, e.g.*, R. 2.E ("All requests for extensions of time . . . must be made not less than **two business days** before the scheduled deadline or date."). These deadlines will not be further extended absent extraordinary circumstances.

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May 1, 2025

**VIA ECF AND E-MAIL**

Hon. Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007  
ReardenNYSDChambers@nysd.uscourts.gov

The Clerk of Court is directed to terminate ECF No. 42.

**SO ORDERED.**

*Jennifer H. Rearden*  
Jennifer H. Rearden, U.S.D.J.  
Dated: May 2, 2025

**Re: *Freeman v. Commonwealth Local Development Corp., et al.*,  
Civil Action No.: 1:24-cv-08823**

Dear Judge Rearden:

This firm represents Defendants Rainbow Apparel of America, Inc. (incorrectly referenced in the Complaint as "Rainbow USA Inc.") and A.I.J.J. Enterprises, Inc. (collectively, "Rainbow") in the above-referenced matter. We write, jointly with Plaintiff Shaniqua Freeman ("Plaintiff") and Defendants Commonwealth Local Development Corp. and HUSA Management Co., LLC (collectively, "HUSA"), to provide a status report. Additionally, Rainbow and HUSA (collectively, "Defendants") respectfully request that the Court extend the respective deadlines to respond to each other's cross-claims.

By way of background, on December 16, 2024 the Court issued an Order directing the parties to mediation. (ECF Nos. 5-6.) After the Mediation Office assigned a mediator to this matter on February 18, 2025, the parties agreed to make the property at issue available for inspection by Plaintiff's expert. This inspection occurred on April 23, 2025. As the parties must discuss remediation of the alleged accessibility issues at a mediation, Plaintiff has agreed to provide a written report from her expert to facilitate the settlement process. Accordingly, the parties have agreed to reschedule the mediation previously set for April 25, 2025 by approximately 30 days, to allow sufficient time for Defendants and their experts to review these findings. The parties are presently scheduling the mediation for early-to-mid June and will advise the Mediation Office accordingly.

Additionally, Defendants respectfully request a further extension of time to respond to each other's cross claims, until after the mediation. This is the second request for an extension of this deadline. Defendants previously filed a letter requesting an extension of time to respond to the cross-claims until after mediation, and the Court granted that



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application on March 24, 2025, under which the responses are due May 2, 2025. (ECF No. 38.)

This application is being filed in good faith, and not to cause undue delay. If granted, the extension would not affect any scheduled dates or deadlines. There are currently no scheduled appearances before the Court. The undersigned has communicated with counsel for the parties, and they join in this application as set forth herein.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)

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